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Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

LD, DB, BW, RH, and CJ, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

UNITEDHEALTHCARE INSURANCE  
COMPANY, a Connecticut Corporation,  
UNITED BEHAVIORAL HEALTH, a  
California Corporation, and MULTIPLAN,  
INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE FOR  
OMNIBUS STIPULATION AND  
OMNIBUS MOTION ON DISPUTED  
SEALING REQUESTS**

Hon. Yvonne Gonzalez Rogers

Hearing: None Set

Complaint filed: April 2, 2020  
Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH, and CJ, and Defendants United Behavioral Health,  
 2 UnitedHealthcare Insurance Company, and MultiPlan, Inc. (together, “Defendants”), collectively  
 3 the “Parties” to the above-entitled action, jointly submit this stipulation pursuant to the Post-  
 4 Briefing Omnibus Sealing Procedures in this Court’s Standing Order in Civil Cases. In further  
 5 support of this Stipulation, the Parties state as follows:

6 **WHEREAS**, on February 13, 2024, the Court issued its Order Granting Modified Sealing  
 7 Procedures requiring the Parties to “jointly file an omnibus sealing motion within 14 days after the  
 8 conclusion of the briefing sequence” (Dkt. No. 399 at 3);

9 **WHEREAS**, on June 26, 2024, the Court granted Defendants’ Motion to File a Sur-  
 10 Reply, allowed Plaintiffs to file a Reply to the Sur-Reply by July 12, 2024 (Dkt. No. 439), and  
 11 set July 26, 2024 (14 days after the conclusion of the briefing sequence) as the deadline for the  
 12 Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes (Dkt. No. 438);

13 **WHEREAS**, on July 12, 2024, Plaintiffs filed their Reply to Defendants’ Sur-Reply (Dkt.  
 14 No. 442), which concluded the briefing sequence on class certification;

15 **WHEREAS**, the Court’s Standing Order in Civil Cases allows the Parties “by stipulation  
 16 filed on the docket, [to] extend the time to file the Omnibus [Sealing] Stipulation and Omnibus  
 17 Motion[s on Sealing Disputes] to 21 days after the conclusion of briefing,” which would be August  
 18 2, 2024, with extensions beyond 21 days requiring approval by the Court;

19 **WHEREAS**, the Parties have agreed to extend the deadline for the Omnibus Sealing  
 20 Stipulation and Omnibus Motions on Sealing Disputes (if necessary) from July 26, 2024 to August  
 21 9, 2024 in light of the voluminous record requiring substantial time for the Parties to meet and  
 22 confer, including ongoing efforts by the Parties to reach agreement on as many sealing requests as  
 23 possible;

24 **WHEREAS**, the extension of the deadline will not alter the date of any other event or any  
 25 other deadline already fixed by Court order;

26 **NOW, THEREFORE**, the Parties hereby stipulate and agree as follows:

27 The deadline for the Omnibus Sealing Stipulation and Omnibus Motions on Sealing  
 28

Disputes (if necessary) currently scheduled for July 26, 2024 is extended to August 9, 2024. If additional time is required for the Parties to meet and confer to finish preparing these documents, the Parties will promptly seek the Court's approval to extend the deadline beyond August 9, 2024.

**IT IS SO STIPULATED.**

Respectfully submitted,

Dated: July 24, 2024

ARNALL GOLDEN GREGORY LLP

By: /s/ Matthew M. Lavin  
Matthew M. Lavin

DL Law Group

By: /s/ David M. Lilienstein  
David M. Lilienstein  
Katie J. Spielman

*Attorneys for Plaintiffs and the Putative Class*

DATED: July 24, 2024

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Derek K. Kraft  
Derek K. Kraft

*Attorneys for Defendants United Behavioral Health and United HealthCare Insurance Company*

PHELPS DUNBAR LLP

DATED: July 24, 2024

By: /s/ Errol J. King, Jr.  
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**[PROPOSED] ORDER**

Having considered the Parties' Joint Stipulation and [Proposed] Order, the Court  
HEREBY ORDERS that deadline for the Omnibus Sealing Stipulation and Omnibus Motions on  
Sealing Disputes (if necessary) is extended to August 9, 2024.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024

\_\_\_\_\_  
The Hon. Yvonne Gonzalez Rogers  
UNITED STATES DISTRICT COURT JUDGE

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

Pursuant to Civil Local Rule 5-1(i)(3) of the Northern District of California, I attest that concurrence in the filing of the document has been obtained from each of the other signatories hereto.

DATED: July 24, 2024

ARNALL GOLDEN GREGORY LLP

/s/ Matthew M. Lavin  
Matthew M. Lavin

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